

ASSESSMENT STRATEGIES FOR REDUCED RISK CIGARETTES

Comments by

Brown & Williamson Tobacco Corporation

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PREFACE

In considering the issue of reduced risk cigarettes, one of the first questions one encounters is which strategy is the best way forward to have maximum positive impact on public health. A policy of encouraging abstinence from smoking is a clear path forward to achieving this objective. Perhaps not so clear is whether, in addition to encouraging abstinence from tobacco use, one should at the same time encourage "safer" smoking for those people who choose to smoke. It can be argued that the availability of reduced risk cigarettes may run counter to public health improvement as it may make smokers less inclined to quit or non-smokers more inclined to start. We know of no way to verify whether this would be the case or not. What we do know is that many people continue to smoke despite nearly universal awareness of the health risk of smoking (1). This leads to two questions:

1. What should be done for people who choose to smoke despite encouragement to abstain?
2. How can we justify depriving those people a lower risk option if such an option is feasible?

We believe that the most realistic and effective strategy is to encourage abstinence from tobacco use as the cornerstone of a policy of reducing smoking-related health risks. At the same time, for those people who choose to smoke, we believe there should be encouragement for cigarette companies to devote efforts toward the research and development of reduced risk products and allow consumers to be made aware of the potential benefits of such products so that they are at least free to choose among a range of options (1). We assume the existence of this committee and our participation in its deliberations is an indication of at least some degree of openness to consideration of the possibilities of making reduced risk products available to the public.

Another issue that the committee will encounter is the question of how to determine whether a particular cigarette modification will, in fact, result in a reduced risk for people who use the product. Based upon decades of responding to this issue, it is our view that the complexities of tobacco smoke, the mechanisms of human disease, and the measurement techniques available leave us in a situation where no test or measurement can predict, with scientific certainty, the impact on human health of a particular tobacco product or product characteristic. This is really not different, however, than the situation that the regulatory agencies face when they must make a determination about the acceptability of permitting public exposure to an environmental chemical, food additive, or new pharmaceutical. They must rely upon a collection of measures based upon epidemiology, toxicology, human clinical biomonitoring, and chemistry to make a judgement concerning acceptability. All of those assessment elements have their own particular uncertainties that ultimately make any judgement of acceptability fall short of

absolute scientific certainty. The primary difference between the situation with tobacco versus the situation with environmental chemicals, food additives, or pharmaceuticals is that, with the latter, there exists an established and agreed upon framework for making judgements about acceptability. That framework is the enabling legislation and subsequent regulations, and procedures the respective regulatory agencies have developed over the years. Within that framework, there are assessment measurements, success criteria, and other elements that, despite the uncertainties they each have, there are agreed upon procedures and criteria for their use and application toward a judgement of acceptability. Such a framework is lacking in the case of the assessment of potential reduction of risks associated with modified cigarettes.

We believe that developing and applying a framework for making assessments and judgements concerning potential benefits of modified cigarettes is a necessary element of any effort to assess the science base for tobacco harm reduction. Moreover, the successful application of such a framework must involve the cooperative efforts of members of the scientific, public health, regulatory, and tobacco products manufacturing communities. In order for such a framework to be successful, it must accommodate a known level of background risk as a starting point and seek to move modified products toward lower risk. We urge the committee to recognize the essential role of such a framework as a way forward in evaluating and judging the potential benefits of cigarettes modified to reduce smoking-related risks.

NOT ALL CIGARETTES POSE EQUAL RISKS

The remainder of this presentation will be primarily concerned with a discussion of the evidence that indicates that:

1. Reductions in cigarette smoke dose and smoke toxicity are likely to reduce smoking health-related risks.
2. Modifications of tobacco products can be made to achieve reductions in both smoke dose and smoke toxicity.
3. Responses of such modified products can be measured and quantified in a range of health-related tests judged to be appropriate.

The collective evidence supporting these conclusions comes from a combination of epidemiology, experimental toxicology, human clinical biomonitoring, and chemistry.

Since it is possible to measure and quantify the effects of modified cigarettes in various health-related measures, it should be possible to develop a mutually agreed framework for assessment of benefits of reduced risk cigarettes to arrive at a judgement with a reasonable degree of certainty of whether a particular modification is likely to move the product toward lower health risks.

**SMOKE DOSE AND SMOKE TOXICITY LIKELY
TO INFLUENCE SMOKING RISK**

The collective literature related to smoking and health provides evidence that not all cigarettes or smoking practices result in equal health risks to smokers. As a general consideration, relative risks reported in epidemiological studies for several smoking-related diseases (e.g., lung cancer) vary over a relatively wide range with the most often cited risk of around 10 for lung cancer (2). Some of this variation is presumably due to differences in study methodologies and susceptibilities of the various populations studied. However, it is reasonable to ask whether a significant portion of this variation is due to differences between the study populations in the types and/or amounts of cigarettes smoked.

Several sources of evidence indicate that smoking-related risks are significantly influenced by smoke dose. Many studies have reported that smoking-related health risks are lower with fewer cigarettes smoked and shorter duration of smoking (2,3,4,5). It is believed that pipe and cigar smokers inhale less smoke than do cigarette smokers. This is believed to be the reason why risks for several smoking-related diseases are lower among pipe and cigar smokers than among cigarette smokers (6,7). Studies have reported that relative risks for lung cancer are lower in people who smoke filter cigarettes versus non-filter cigarettes (8,9,10,11,12,13). Likewise, there is some indication in the scientific literature that smokers of lower "tar" cigarettes may have lower risks for some smoking-related diseases than do smokers of higher "tar" cigarettes (13,14,15,16,17,18). For example, Hammond and co-workers reported a 20% reduction in risk for lung cancer in males and a 40%

reduction in the risk for female smokers of low tar cigarettes compared with smokers of high tar cigarettes (19). "Tar" yields of cigarettes as measured by the FTC method have declined approximately 50% from the 1950s to the present (20). An autopsy study reported that pathological changes in the bronchial epithelium of smokers were far less frequent among smokers who died in the 1970s compared with smokers who died in the 1950s (21). This finding prompted the authors of the study to predict a decline in the future in death rates from lung cancer among cigarette smokers. In fact, it has been reported that among males, there has been a decline in lung cancer rates since 1990 (22). This decline continues to the present. Finally, responses in experimental toxicity studies are almost invariably lower among low dose groups relative to higher dose groups (23,24,25). Collectively these observations indicate that product modifications that can be shown to result in lower smoke dose should move the product toward lower risk.

Investigators have suggested that smoking-related risks may be significantly influenced by smoke toxicity (26,27). Several studies have reported that people who smoke primarily black tobacco have higher risks for some smoking-related diseases than do people who smoke primarily blond tobacco (28,29,30,31,32). While the reasons for differences in risk are not known, hypotheses have been advanced that the difference may be due to higher levels of tobacco specific nitrosamines (TSNAs) in black tobacco (33). It has been suggested that use of charcoal filters may be a positive strategy toward lower risk cigarettes (34,35). This is presumably because of the ability of charcoal filters to reduce the levels of several vapor-phase constituents in smoke (36). Relative risks have been reported to be lower among users of moist snuff in Sweden (37,38,39,40) compared with

the United States (41). It has been suggested that this is due to the lower levels of TSNAs in Swedish moist snuff compared with U.S. moist snuff (38). Finally, responses in experimental toxicity studies [i.e., *in vitro* genetic toxicity (42,43,44,45,46), *in vitro* cytotoxicity (47,48), mouse skin painting (49), and inhalation studies (50,51)] have been shown to vary significantly per unit dose with different types of tobacco and other cigarette design parameters. Collectively these observations indicate that product modifications can be made which result in a smoke composition that produce lowered responses in such tests. As with modification of smoke dose, it may be feasible to modify the toxicity of smoke in a direction of reduced risk.

ASSESSMENT ELEMENTS

During this presentation, we will discuss several approaches for measuring health-related parameters of cigarette smoke. It is important to recognize that cigarette smoke is actually composed of two distinct phases, a vapor phase, and a particulate phase (52). A number of smoke constituents have been identified which are believed to play a role in smoking-related diseases. Some of these constituents exist only in the vapor phase, some exist only in the particulate phase, and some may equilibrate between the two phases depending upon their physical and chemical properties and the environmental conditions in which they exist. We mention this only to bring to your attention that some strategies for lower risk cigarettes may focus on one phase of smoke as opposed to whole smoke. Also, because of the logistics of collecting smoke samples, some methods of smoke assessment may measure only one of these phases, which is typically the particulate phase or "tar".

Another concept that is important to appreciate is the concept of modifying the *quantity* of smoke a person gets in contrast to the *quality* of smoke a person gets. Modification of the quantity of smoke addresses the issue of total smoke dose. It is possible to modify smoke dose without modifying the relative proportions of individual constituents within the smoke. An example of this would be to reduce the density of tobacco in the cigarette. On the other hand, modification of the quality of smoke addresses the issue of modifying the proportions of constituents within the smoke and thereby the relative toxicity of the smoke. Examples of this might include use of activated charcoal in a filter to selectively reduce

some vapor-phase smoke constituents or use of alternative tobacco curing techniques to reduce the levels of TSNAs in smoke.

Epidemiology

Human epidemiology is among the assessment elements potentially available that can be applied to an assessment of whether modified cigarettes are, in fact, lower risk cigarettes. It has been instrumental in pointing to the associations of tobacco use and increased risks of various diseases in humans. As indicated above, it has also pointed to possible differences in risk resulting from use of:

- Pipe and cigar versus cigarettes (6,7)
- Black versus blond tobacco (28,29,30,31,32)
- Filter versus non-filter cigarettes (8,9,10,11,12,13)
- High tar versus low tar, cigarettes (13,14,15,16,17,18,19)
- Charcoal versus non-charcoal filters (53)
- Swedish moist snuff versus American moist snuff (38)

Unfortunately epidemiology cannot tell us the mechanism(s) of how smoking might contribute to disease and what modifications need to be made in cigarettes to reduce those risks. Its greatest strength is that it provides information about the product as actually used by the species of interest, namely, humans. It eliminates uncertainties resulting from use

of surrogates for fresh whole smoke, human smoking behavior, and human health effects endpoints. It evaluates effects of both smoke quality and quantity.

Its weaknesses are that it is subject to confounding from uncontrolled variables within study populations (54)... This shortcoming becomes increasingly critical as observed associations become weaker as may be the case when making comparisons of conventional cigarettes with modified cigarettes. It is subject to bias resulting from selection of study design and methodology parameters. As with confounding, this shortcoming becomes increasingly critical, as observed associations become weaker as may be the case with assessment of different types of cigarettes. The ability of an epidemiological study to detect a small effect is related to the size of the study. However, even a small effect in a large population is difficult to detect even though it may be significant from a public health point of view. Perhaps the biggest shortcoming of the use of epidemiology to assess modified cigarettes is the length of time it would take to get meaningful results. For assessment of a new modified cigarette, a retrospective study design would not be feasible. A prospective study would require approximately 7-15 years to complete. Moreover, it would require a large number of people to have smoked a novel product to conduct an epidemiological study. Perhaps their most promising use would be for long-term surveillance of people using a modified product in the years following its market introduction.

Human Biomonitoring

Human biomonitoring for presence of cigarette smoke constituents in body fluid samples is another valuable approach for assessment of modified cigarettes (55). A number of cigarette smoke constituents have been evaluated in this manner. The most common is measurement of nicotine and its metabolites in blood, saliva, and urine (56,57). In addition, adducts derived from smoke constituents including nitrosamines, polycyclic aromatic hydrocarbons (PAHs), and aromatic amines have been measured in various body fluids and tissue samples (58,59,60).

In addition to measures of smoke constituents in body fluids and tissues, a number of functional end points have been examined for measures of cigarette smoke exposure. These include:

- Platelet aggregation (61)
- Various serum lipids (62)
- Pulmonary function measures (63)
- Arterial wall thickness (64,65)
- Urine mutagenicity (66,67)
- Mutation spectra of selected genes (68)

An obvious strength of human biomonitoring is that it can provide an indication of cigarette smoke exposures in humans under conditions of actual cigarette use, thus taking

into account human smoking behavior. This minimizes uncertainties of use of surrogates or indirect measures of exposure. The techniques are generally not prohibitively expensive or time consuming. Samples and measurement techniques are generally available.

For most biomarkers, the majority of research investigations have focused on being able to distinguish between smokers versus non-smokers, or people who have been exposed to ETS versus not exposed to ETS. They typically have not focused on discrimination of people who smoke different amounts or types of cigarettes. As a consequence, the majority of the techniques reported have not been validated as a means of discriminating differences between people who smoke different amounts or types of cigarette products. Most end points (both chemical and functional) are not specific to tobacco (69). Therefore, significant background responses are often observed in non-smokers. Moreover, responses can be highly variable among test subjects. It is not uncommon for such techniques to be unable to discriminate even between smokers and non-smokers (69,70,71). In contrast to standardized chemical and toxicological tests conducted in accordance with GLP regulations typical for regulatory submissions, the methods used for most biomonitoring studies are not standardized or cross checked between laboratories (72). This makes it difficult to make comparisons between laboratories and investigators. There is also the issue of uncertainty of the role of a given endpoint in smoking associated disease and what a reduction in response in a particular test might mean as far as smoking-related disease is concerned.

Despite these uncertainties several techniques have been explored. It might be assumed that if a technique is able to detect exposure to ETS, it might have promise for detecting significant differences in exposures comparing people who smoke conventional versus modified cigarettes. This assumption would require validation. Nevertheless, a number of measures have been reported that either detect differences in people who smoke different amounts of tobacco, different types of tobacco, or between people who are self reported to be exposed to ETS versus people not exposed to ETS. These measures include:

- Nicotine and its metabolites in urine, serum, saliva (56,73)
- Expired CO, COHb (55,74,75)
- TSNA urinary metabolites (e.g., NNAL) (76,77)
- 4-Aminobiphenyl hemoglobin adducts (78,79,80,81,82)
- Acrylamide hemoglobin adducts (83)
- Acrylonitrile adducts with hemoglobin (83,84)
- Benzene (exhalate or levels of metabolites in body fluids) (85,86,87)
- PAH adducts (60,76,88,89)
- Platelet aggregation (90)
- Fibrinogen in plasma (91)
- Carotid wall thickness (64,65)
- Some serum lipids (e.g., total cholesterol, HDL) (92,93)
- Urine mutagenicity (66,67)

Experimental Toxicology

A wide range of experimental toxicity tests has been explored in attempts to characterize health-related effects of various cigarette types and design parameters. The three largest categories of the types of tests employed are:

1. Inhalation tests of fresh whole smoke conducted primarily in rodents (23,24,50,51,94).
2. Skin painting tests of whole smoke or particulate phase condensate conducted primarily in mice (25,95).
3. Short term *in vitro* tests of smoke particulate phase condensate or whole smoke for genetic and cytotoxicity conducted in a variety of biological systems (42,43,44,46,48,96), of which, the Ames *salmonella* mutagenicity assay (97) is by far the most frequently reported.

The primary advantage of experimental toxicology is the ability to isolate and focus on test elements of interest by controlling confounding environmental factors. The test methods are readily available, relatively short-term, and of a reasonable cost. The methodologies are well standardized and can be conducted in accordance with GLP regulations. Furthermore, there is an abundant background literature for comparisons.

Experimental toxicology has a number of uncertainties. Researchers have noted that most of the classical toxicity tests conducted in laboratory animals have failed to consistently reproduce the human diseases associated with cigarette smoking (98,99,100). Therefore,

the commonly used test species may not be good models for how humans respond to smoking. For some testing methodologies, only smoke condensate (particulate matter) is tested as a surrogate for fresh whole smoke. There may also be uncertainty about the relevance of the test end point. For example, we do not know the relevance of mouse skin tumors to human lung cancer. For that reason, we do not know with certainty what a reduction in potency in such a test of smoke condensate from a modified cigarette means for human health risks. Finally it is not uncommon to observe what appears to be conflicting responses in various tests. For example, smoke from cigarettes composed of only burley tobacco is more potent than smoke from flue-cured tobacco in the Ames test but less potent in the mouse skin painting test (42).

Nevertheless, toxicology tests have demonstrated the ability to distinguish differences in different product types and cigarette design parameters including differences in:

- Types of tobacco (42,43,46,48,49,50,101)
- Filter ventilation (46,49)
- Charcoal versus non-charcoal filters (47)
- Tobacco substitutes (50,51)
- Smoke particulate versus vapor phase (102)
- Novel cigarette products (103,104)
- Removal of tobacco protein (105)
- Other cigarette design variables (49,106)

Smoke Chemistry

More than 4000 compounds have been identified in cigarette smoke through the use of analytical chemistry (107). Some of these compounds are believed to play an important role in the health risks associated with cigarette smoking (108,109,110). Examples include:

- Tobacco specific nitrosamines (111)
- Volatile nitrosamines (112)
- Polycyclic aromatic hydrocarbons (113,114)
- Various aldehydes (115,116)
- "Tar", nicotine and carbon monoxide (110,117)
- Various aromatic amines (118)
- Nitrogen oxides (119,120)
- Hydrogen cyanide (121)
- Ammonia (122)
- Catechol, hydroquinone, and various other phenols (123,124)
- Benzene, toluene, xylene (115,125)
- Pyridine and quinoline (118)
- Isoprene and butadiene (125)
- Various heavy metals (126,127,128)
- Free radicals (119,129,130)
- Others (131,132)

Smoke chemistry allows the ability to focus on particular smoke constituents of concern. Very low levels of constituents in smoke and very small differences of individual smoke constituents in different products can be detected. The overall simplicity versus complexity of cigarette smoke as it might be influenced by cigarette modifications can be assessed. Measurement techniques for smoke constituents are readily available and can be obtained relatively quickly, and at a reasonable cost. There is an abundant background literature for comparisons of levels of smoke constituents in various products.

The primary weakness of smoke chemistry is that it is not a biological endpoint. Focusing on a particular constituent requires an examination of the relevance of the constituent and reduction of the levels of the constituent to smoking associated disease in humans. The analytical determination requires the collection of a sample of smoke under some defined set of machine smoking parameters. Many aspects of the collection parameters can significantly influence the levels of various constituents measured. Therefore the levels of constituents measures in smoke can be highly dependent upon the smoke collection methodology.

Despite these limitations the use of smoke chemistry has been shown to distinguish differences in different product types including differences in chemistry resulting from:

- Different types of tobacco/blends (49,133, 134,135,136)
- Filtration and filter ventilation (49,137,138)

- Charcoal versus non-charcoal filters (116)
- Tobacco substitutes (139,140,141)
- Novel cigarette products (142,143)
- Other cigarette design variables (132,144,145,146)

DISCUSSION AND RECOMMENDATIONS

The collective smoking and health research literature provides evidence that not all cigarettes or smoking practices pose equal risks. This indicates that it is possible to develop products that pose lower risks than others do. There is also evidence that both smoke dose and smoke toxicity may play roles in influencing tobacco smoke risk. Moreover, the effects of different tobacco products can be detected and quantified in a variety of health related measures. These measures include epidemiology, biomonitoring, experimental toxicology, and analytical chemistry. However, the complexities of tobacco smoke, mechanisms of human disease, and the measurement techniques available leave us in a situation where no test or measurement can predict, with scientific certainty, the impact on human health of a particular tobacco product or product characteristic. Nevertheless, because various measurement techniques have demonstrated an ability to discriminate differences in health-related responses to different tobacco product types, it should be possible to construct a measurement and assessment framework that can be applied to cigarettes modified to reduce risks. In order for such a framework to be successful, it would require the assistance and cooperation of members of the scientific, public health, regulatory, and tobacco products manufacturing communities.

Because of the uncertainties of any given health-related measure, an assessment approach should draw upon a wide range of assessment elements including smoke chemistry, experimental toxicology, human smoking behavior, human biomonitoring, and long-term human surveillance.

Perhaps the most important challenge to evaluating the benefits of reduced risk cigarettes is the evaluation of the acceptance of such products by the public. There are very few strategies of which we are aware for reducing smoke dose and/or smoke toxicity that can be achieved without some degree of alteration of the taste and/or other performance characteristics of the product. This frequently results in the consumer simply not liking the product compared to conventional products and being unwilling to use it. As might be expected, the greater the degree of novelty of the modification used to achieve reduced risks, the greater the likelihood that the consumer will dislike the product. Obviously, if a product is not accepted, it will provide no benefit to anyone despite its technical innovations.

Therefore, if one believes that development and introduction of reduced risk cigarettes is a positive strategy toward risk reduction among smokers, then the issue of how gradually versus rapidly technological innovations should be introduced into cigarettes in the market place deserves consideration. A product with very novel technological innovations is likely to offer relatively more health-related improvements than a product with more modest modifications. However, such a product is more likely to be rejected by consumers. If this were the case, potential benefits would never be realized. On the other

hand, a product modification strategy that gradually incorporates modest innovations in a step-by-step process whereby each change is not so great as to result in consumer rejection may, in the end, result in the greatest reductions in health risks as it is more likely to be used by consumers. At this point, it is not possible to know where the balance of product novelty, potential benefits, and consumer acceptance may be struck. Therefore, we believe that, because both approaches have the potential to reduce health risks for people who chose to smoke, both revolutionary/novel and gradual, continuous, step-by-step approaches should be pursued. In order to encourage both approaches we feel that product assessment approaches should take into account the nature of the modification employed (i.e., novel versus modest step-by-step) by tailoring the scope of assessment elements and success criteria according to the extent and novelty of the modification.

Another consideration that is critical to achieving the maximum benefit from reduced risk cigarettes is that of consumer awareness about improved products. Very few people would be willing to select what they perceive as an inferior-performing product in the absence of some other benefit they want. For example, fewer people would be willing to use diet soft drinks if they were not aware that they are reduced in calorie content. The same is the case with reduced risk cigarettes. We believe it is inevitable that technological innovations that can bring about significant health-related improvements in cigarettes will also result in alterations in the performance of the product, which will be perceivable by consumers. If the consumer is made aware of the potential benefits of the modified product, they may be willing to accept a reduction in performance. We, therefore, believe that it is vital to permit accurate communication to consumers about potential benefits resulting from

reduced risk cigarettes. If the collective judgement of appropriate scientists (based on a mutually agreed upon assessment framework) is that a particular product modification has moved the product toward lower health risks, from a public health point of view, people who choose to smoke should be made aware of such a product thus allowing them the opportunity to make an informed choice. A mutually agreed framework for communication to the public about reduced risk cigarettes is needed. The nature of communications to consumers about product attributes should be tailored according to the extent and novelty of the modification and potential benefits it may offer.

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